

Hon. Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F. Technologies, a California corporation; MOZILLA FOUNDATION, a California public benefit corporation; LAURA CHAMBERS and her marital community; WINIFRED MITCHELL BAKER and her marital community, and DANI CHEHAK and her marital community,

Defendants.

No. 2:24-cv-01032-RAJ

DEFENDANT WINIFRED MITCHELL BAKER'S NOTICE OF JOINDER IN DEFENDANTS MOZILLA CORPORATION, ET AL.'S MOTION TO CONTINUE TRIAL DATE AND AMEND CASE SCHEDULE

**NOTE ON MOTION CALENDAR:  
MAY 16, 2025**

Defendant Winifred Mitchell Baker ("Baker"), by and through her undersigned attorneys, joins in Defendants Mozilla Corporation a.k.a. M.F. Technologies, Mozilla Foundation, Laura Chambers and Dani Chehak's (the "Mozilla Defendants") Motion to Continue Trial Date and Amend Case Schedule [Dkt. 40], filed April 25, 2025 (the "Motion"), and incorporates by reference all of the arguments contained therein.

In addition to all of the reasons set forth by the Mozilla Defendants, a continuance is especially appropriate for Baker, who has only started being represented in this matter by her own counsel as of April 9, 2025. *See* [Dkt. 33]. While Baker's counsel is working diligently to get up to speed, the process is akin to aiming at a moving target in light of the outstanding discovery motion, the resolution of which will determine (to a degree)

1 Baker's discovery obligations in this case. As a result, the prejudice to Baker if the matter  
 2 proceeds on its currently compressed schedule will be particularly acute, as Baker will not  
 3 only have to overcome all of the challenges identified by the Mozilla Defendants, she will  
 4 have to do so with counsel who have significantly less familiarity with the specific  
 5 discovery issues that counsel for the other parties have been engaged with for more than  
 6 half a year. A short continuance will allow Baker's counsel time to fully flesh out her  
 7 position with the benefit of guidance from the Court's decision on the outstanding  
 8 discovery motion, and ensure that she is on even footing with the other parties. For that  
 9 reason, as well as for the reasons set forth by the Mozilla Defendants, Baker respectfully  
 10 requests that the Court grant the Motion.

11  
 12 I certify that this memorandum contains 275 words, in compliance with the Local  
 13 Civil Rules.

14 DATED this 29<sup>th</sup> day of April, 2025.

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